

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No.: 21-CR-108 (2) (PAM/TNL)

UNITED STATES OF AMERICA,

Plaintiff,

VS.

TOU THAO,

Defendant.

**MOTION FOR DISCOVERY AND  
INSPECTION OF EXPERT WITNESS  
TESTIMONY**

The Defendant, Mr. Tou Thao, by and through his attorneys, Robert Paule and Natalie R. Paule, respectfully moves this Court, pursuant to Rule 16(a)(1)(E) of the Federal Rules of Criminal Procedure for an order requiring the Government to disclose a written summary of testimony of any expert witness the Government intends to use under Rules 702, 703 or 705 of the Federal Rules of Evidence during its case in chief at trial. The summary must describe the witnesses' qualifications.

This Motion is based on the indictment, the records and files in the above-entitled action, and any and all other matters which may be presented prior to or at the time of the hearing on said Motion.

Respectfully submitted,

Dated: This 3<sup>rd</sup> day of August, 2021

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